

**SINAYSKAYA YUNIVER** p.c.  
ATTORNEYS AT LAW

March 16, 2020

**VIA ECF**

Honorable Magistrate Judge Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: *Marilenis Duran De Rodriguez et al. v. Five Star Home Health Care Agency, Inc. et al.*  
Case No.: 1:18-cv-02333-PK

**LETTER MOTION REQUEST FOR ADJOURNMENT**

Dear Honorable Judge Peggy Kuo:

This office represents the named defendants Five Star Home Health Care Agency, Inc. and Ivette Markov (collectively “Defendants”) in the above-referenced action. In accordance with Your Honor’s Individual Rules of Practice, we write on behalf of Defendants, with Plaintiffs’ consent and support, to respectfully request an adjournment of the Court ordered in-person hearing currently scheduled for March 17, 2020 at 12:00 p.m.

In light of the current state of emergency caused by the ongoing COVID-19 (“Corona-Virus”) pandemic, our offices will be effectively closed for the next two weeks. We are taking this precautionary measure as a result of a member of our firm having recently returned from the United Kingdom, a country that was recently added by the federal government to the “travel ban list”, and had then returned to the office. Furthermore, we are seeking to comply with the recommendations being by issued by all levels of government.

As such, we respectfully request that said in-person hearing date be adjourned by at least two (2) weeks, or until such time thereafter as the Court deems appropriate and the government recommended distancing and precautionary measures are no longer in effect. This is the first request for such an adjournment by the parties. Such an adjournment will not affect any other scheduled dates or deadlines in this matter.

We appreciate Your Honor’s time and attention to this matter, and should the Court need any further information we remain at the Court’s disposal.

Respectfully submitted,

*/s/ Irene Sinayskaya, Esq. (IS5002)*

cc: All Counsel of Record (via ECF)

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